

DOMINICA C. ANDERSON (SBN: 2988)
TYSON E. HAFEN (SBN: 13139)
DUANE MORRIS LLP
100 N. City Parkway, Suite 1560
Las Vegas, NV 89106-4617
Telephone: 702.868.2600
Facsimile: 702.385.6862
E-Mail: dcanderson@duanemorris.com
tehafen@duanemorris.com

Attorneys for Defendant
Liberty Mutual Insurance Company

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WILSHANDA GARNER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE CO., a
Massachusetts company, and JOHN DOE d/b/a
Your Grant Advisor,

Defendants.

Civil Action No.: 2:20-cv-00836-GMN-VCF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANT LIBERTY MUTUAL
INSURANCE COMPANY TO FILE
RESPONSE TO COMPLAINT**

(FIRST REQUEST)

Defendant Liberty Mutual Insurance Company ("Liberty"), has requested an extension of time within which to answer, move or otherwise respond to the complaint in this matter and plaintiff has no opposition. Accordingly, pursuant to LR IA 6-1 and 6-2, IT IS HEREBY STIPULATED by and among counsel, that Liberty's time to answer, move or otherwise respond to the complaint in this action is extended 30-days from June 1, 2020, through and including July 2, 2020.

The request was made by Liberty because it did not know the complaint had been served until June 4, 2020 when plaintiff's counsel provided a copy of, and then filed, an affidavit of service of the complaint. Counsel for Liberty's prior emails sent to plaintiff's counsel on May 15 and June 2 apparently had gone to plaintiff's counsel's junk mail folder.

1 This stipulation is filed in good faith and not intended to cause delay.

2 LAW OFFICES OF CRAIG B.
3 FRIEDBERG, ESQ.

DUANE MORRIS LLP

4 By: /s/ Craig B. Friedberg
5 Craig B. Friedberg (SBN 4606)

6 Attorneys for *Plaintiff*

By: /s/ Tyson E. Hafen
Dominica C. Anderson (SBN 2988)
Tyson E. Hafen (SBN 13139)
Attorneys for Defendants *Liberty Mutual*
Insurance Company

7
8 **IT IS SO ORDERED:**

9 
10 _____

UNITED STATES MAGISTRATE JUDGE

11 6-9-2020

12 DATED: _____
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28